



Michael S. Weinstein
Member
Admitted in NJ and NY

Reply to New Jersey Office
Writer's Direct Line: 201.525.6321
Writer's Direct Fax: 201.678.6321
Writer's E-Mail: MWeinstein@coleschotz.com

Court Plaza North
25 Main Street
P.O. Box 800
Hackensack, NJ 07602-0800
201-489-3000 201-489-1536 fax

—
New York
—
Delaware
—
Maryland
—
Texas
—
Florida

August 2, 2024

The Honorable Michael A. Hammer, U.S.D.C.M.J.
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: ***United States v. Scanlon*, 23 Mag. 10168 (MAH)**

Dear Judge Hammer,

This firm recently substituted as lead counsel in the pending matter. Please accept this letter in lieu of a formal motion on behalf of Defendant Christopher Scanlon. We respectfully move to modify bail conditions.

Under the proposed modification, restrictions on domestic travel, curfew, and ability to work would be removed. Notification to Pretrial Services would occur 48 hours prior to travel. Restrictions on International travel would remain in place. A proposed Consent Order is attached.

Government counsel and U.S. Pretrial Services Agency consent to this request.

We are available to answer any questions.

Respectfully submitted,

/s/ *Michael S. Weinstein*

Michael S. Weinstein

cc: All counsel of record (via ECF)
U.S. Pretrial Services Officer Andrew Dziopa (via email)
U.S. Pretrial Services Officer Ivette Suárez (via email)